

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

MEDICAL PROPERTIES TRUST, INC.,

Plaintiff,

v.

VICEROY RESEARCH LLC, *et al.*,

Defendants.

Case No. 2:23-cv-00408-RDP

**DEFENDANTS' MOTION FOR EXTENSION OF PAGE LIMITS FOR SUMMARY
JUDGMENT BRIEFING**

Defendants respectfully move the Court for an extension of the page limits for their upcoming motion for summary judgment. In support of said motion, Defendants state as follows:

1. Defendants intend to move for summary judgment imminently and are preparing their evidentiary record and briefing in support of said motion. Pursuant to Appendix II of the Court's initial Scheduling Order (ECF # 64), initial and response briefs are limited to 30 pages double spaced using 12-point typeface, and reply briefs are limited to 20 pages.

2. Defendants request that the page limits be extended to 50 pages for initial and response briefs, and 20 pages for the reply brief.

3. Good cause exists for this extension. The evidentiary record in this case is complex, and given that the statements of undisputed material facts are to be counted towards the page limits, Defendants need more than 30 pages to brief their motion, and anticipate Plaintiff will need the same.¹

¹ Defendants' counsel reached out to Plaintiff's counsel on Tuesday of this week on this issue, but have not heard back from Plaintiff's counsel.

4. Defendants are cognizant that brevity is the hallmark of effective advocacy, and will keep this principle at the forefront of their minds in their upcoming submission. Defendants will further attempt to keep their briefing under 50 pages. But to be safe, Defendants request that the page limits be extended to up to 50 pages for initial briefs.

WHEREFORE, Defendants respectfully pray that the page limits for summary judgment briefing be extended to 50 pages for initial and response briefs and 20 pages for the reply brief, and for any other relief the Court deems appropriate.

Respectfully Submitted,

Dated: August 23, 2024

/s/ Richard M. Elias:

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CERTIFICATE OF SERVICE

I hereby certify that I sent a copy of the foregoing to all counsel of record via email on August 23, 2024.

/s/ Richard M. Elias

Richard M. Elias